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*Attorneys for Plaintiff Jeremy Stanfield  
and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

JEREMY STANFIELD, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

TAWKIFY, INC.,

Defendants.

**Case No. 3:20-cv-07000-WHA**

**DECLARATION OF JEREMY  
STANFIELD IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT TAWKIFY, INC.'S  
MOTION FOR AWARD OF  
ATTORNEYS' FEES AND COSTS**

Date: December 2, 2021  
Time: 8:00 a.m.  
Courtroom: 12  
Judge: Hon. William H. Alsup

I, JEREMY STANFIELD, declare as follows:

1. I am an individual over 18 years of age. I am the plaintiff in this action. I have personal knowledge of all information stated below and I am competent to testify thereto.

2. In June 2020, I paid Tawkify \$3,700.00 for matchmaking services and a package of six, in-person dates. I hoped, and was promised, that Tawkify would make dating easier for me without having to deal with all the normal hassle of online dating.

3. I was extremely frustrated with Tawkify's matchmaking services and felt as if the company took advantage of me. I had been told I would be set up on in-person dates, but after I paid, I was told that most of my dates would be by Zoom. I would never pay more than \$600 per date to be set up on a Zoom video conference.

4. I tried to cancel from very early on, but I felt like Tawkify just ignored my requests. I grew increasingly frustrated and upset. When Tawkify told me that they would be giving me a refund, and then only refunded half of money, I was furious and lost my temper. I regret having used such strong language when I frustratedly told Tawkify that I would be seeking legal representation. I did not think Tawkify treated me fairly, especially given the price of its services. I felt powerless to remedy this treatment until I retained legal counsel.

5. If Tawkify was taking advantage of me, they were also taking advantage of other people. The two (disastrous) dates that they set up me up on were with other Tawkify members who also paid Tawkify. The two dates were not a good fit for me; and I was not a good fit for them. Tawkify scammed all three of us. I took part in this suit not just to get the rest of my money back, but to also try to get relief for the other people who Tawkify took advantage of, because I believe that Tawkify's practices are widespread and not limited to me.

6. I did not, and do not, have the resources to pay for my legal counsel or litigation costs associated with this case and needed to find attorneys who would take this case on contingency.

7. I have reviewed the motion for attorneys' fees and costs submitted by Tawkify. ■

- 1 [REDACTED]
- 2 8. [REDACTED]
- 3 [REDACTED]
- 4 [REDACTED]
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- 6 [REDACTED]
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- 10 10. [REDACTED]
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24	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]

14. [REDACTED]

[REDACTED]

[REDACTED]

15. [REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 14th day of October, 2021, in Murietta, California.

  
Jeremy Stanfield (Oct 14, 2021 12:28 PDT)  
 JEREMY STANFIELD